

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

BRIUNA HARPER,

Plaintiff,

v.

Case No: 1:25-cv-00686-BBC

TCC WIRELESS LLC and XYZ
INSURANCE COMPANY,

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Defendant TCC Wireless LLC moves for a 30-day extension of time to respond to Plaintiff's complaint. Counsel have conferred and this motion is unopposed.

Plaintiff filed her complaint on May 9, 2025. (D.E. 1.) TCC Wireless received service of the summons and complaint on May 13, making its deadline to respond June 3, which has not yet expired. (D.E. 5).

TCC Wireless is working to respond to the complaint but is still in the process of gathering the information necessary to fully evaluate Plaintiff's claims. Accordingly, TCC Wireless seeks a 30-day extension of its deadline to file a responsive pleading.

On May 30, 2025, counsel for TCC Wireless conferred with Plaintiff's counsel regarding this motion. Plaintiff's counsel stated that Plaintiff has no objection.

For the reasons discussed above, the Court should grant TCC Wireless's motion and extend the time for it to respond to the complaint by 30 days, up to and including July 3, 2025.

Dated: May 30, 2025

Respectfully submitted,

TCC WIRELESS LLC

/s/ Benjamin S. Morrell

Benjamin S. Morrell (IL ARDC No. 6341896)

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CERTIFICATE OF SERVICE

I hereby certify that on the date listed below, I filed the foregoing document with the Clerk of the Court using the Court's CM/ECF filing system, which will send notice of such filing to all counsel of record.

Date: May 30, 2025

/s/ Benjamin S. Morrell